

TMH:th  
AO 91 (Rev. 5/85) Criminal Complaint**United States District Court****STATE AND DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT****ROBERTO JESUS ARAGON and  
MIGUEL MORAN-HELGUERA**

CASE NUMBER:

11-MJ-371 AJB

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 6, 2011, in Dakota County, in the

State and District of Minnesota, and elsewhere, the defendants did, (Track Statutory Language of Offense)

unlawfully, knowingly and intentionally conspire to distribute a mixture and substance containing a detectable amount of cocaine, a controlled substance,

in violation of Title 21 United States Code, Sections 841(a)(1), 841(b)(1)(C) and 846.

I further state that I am a Special Agent, HSI and that this complaint is based on the following facts:  
Official Title

See Attached Affidavit

Continued on the attached sheet and made a part hereof:



Yes



No

Sworn to before me and subscribed in my presence,

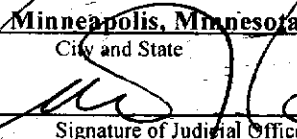
Date

September 7, 2011

at

Minneapolis, Minnesota  
City and StateArthur J. Boylan, Chief U.S. Magistrate Judge  
Name & Title of Judicial Officer

Signature of Judicial Officer



SCANNED

SEP 09 2011

U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA       )  
                                      ) AFFIDAVIT OF TRAVIS W. HAMBLLEN  
COUNTY OF HENNEPIN       )

I, Travis W. Hamblen, being duly sworn, depose and state as follows:

1. I am a Special Agent with Homeland Security Investigations ("HSI"), and I am currently assigned to the Drug Enforcement Administration as a Task Force Officer. I have been a federal law enforcement officer since 1996. In my current assignment, I investigate federal drug trafficking and money laundering violations. I have received specialized training pertaining to drug trafficking, money laundering, undercover operations and electronic and physical surveillance procedures. I have been involved in numerous investigations dealing with the possession, manufacture, distribution, and importation of controlled substances.

2. This affidavit is submitted in support of a criminal complaint charging Roberto Jesus Aragon and Miguel Moran-Helguera with conspiracy to distribute a mixture and substance containing a detectable amount of cocaine in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 846.

3. The facts and information contained in this affidavit are based upon my personal knowledge and the investigation and observations of other officers and agents involved in the investigation. All observations referenced below that were not personally made by me were related to me by the persons who made

such observations. This affidavit contains information necessary to support probable cause for this application. It is not intended to include each and every fact and matter observed by me or known to the government.


4. On September 6, 2011, at approximately 11:15 a.m., I arrested Miguel Moran-Helguera ("Moran") in Eagan, Minnesota, for an immigration violation. Incident to his arrest, I located a plastic bag in his shoe which contained five smaller baggies collectively weighing about 10 grams. Each of these baggies contained a white powdery substance believed to be cocaine. These, and all other suspected drug samples referenced below, field-tested positively for the presence of cocaine.

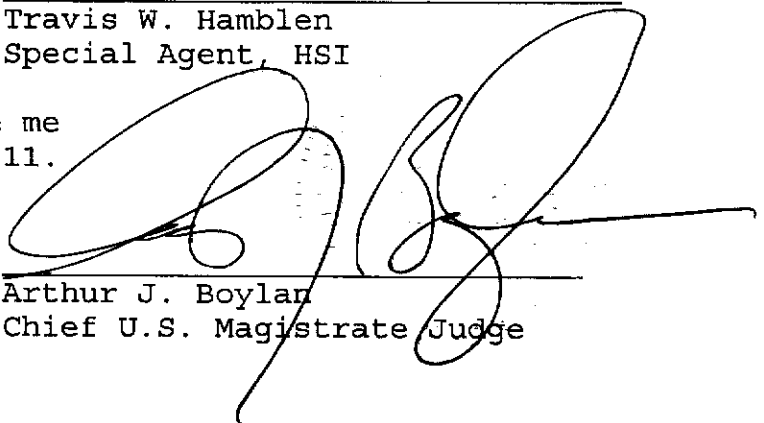
5. In conjunction with Moran's arrest, a search warrant was executed at his residence in Eagan, Minnesota. Upon entering the residence, the police encountered Roberto Jesus Aragon ("Aragon"), who is believed to be Moran's son. He was the sole occupant of the residence and was standing in a hallway next to the bathroom on the main level of the residence. An agent heard a toilet flushing, entered the bathroom, and saw several baggies swirling around the toilet bowl. He was able to recover five of the baggies, each of which contained a white powdery substance believed to be cocaine. The police seized approximately 436 grams of suspected cocaine in various locations in the residence in different states of preparation. Some baggies contained hard blocks of suspected

cocaine (which appeared to be broken off of a larger "brick" of cocaine). Other bags contained numerous smaller baggies which appeared to be ready for distribution in "8-ball" (one-eighth ounce) quantities. The police also recovered two containers of inositol powder (which I know is commonly used as a "cutting agent"), two scales which contained suspected cocaine, and approximately \$9,400 in cash.

6. Based on the foregoing, there is probable cause to believe that Roberto Jesus Aragon and Miguel Moran-Helguera unlawfully, knowingly and intentionally conspired to distribute a mixture and substance containing a detectable amount of cocaine in violation of 21 U.S.C. §§ 841(a)(1), 841(a)(1)(C) and 846.

Sworn and subscribed to before me  
this 7th day of September, 2011.

  
Travis W. Hamblen  
Special Agent, HSI

  
Arthur J. Boylan  
Chief U.S. Magistrate Judge